

RCH:RWN
F. #2023R00648

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

ABOUBACAR KABA,

Defendant.

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF AN ARREST WARRANT

(18 U.S.C. § 2314)

Case No. 25-MJ-66

----- X

EASTERN DISTRICT OF NEW YORK, SS:

STEPHEN INTRABARTOLA, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between May 2022 and November 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ABOUBACAR KABA, together with others, did knowingly and intentionally transport, transmit and transfer in interstate commerce goods, wares and merchandise of the value of \$5,000 or more, to wit: motor vehicles, knowing the same to have been stolen, converted and taken by fraud.

(Title 18, United States Code, Section 2314)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been for approximately four years. I am currently assigned to the FBI John F. Kennedy International Airport Resident Agency. I have been involved in the investigation of numerous cases involving theft and interstate transportation of stolen goods. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant’s criminal history record; and from reports of other law enforcement officers involved in the investigation.

I. Background

2. The FBI, in collaboration with the Port Authority of New York and New Jersey Police Department (the “PANYNJ PD”) and other law enforcement agencies, is investigating a pattern of thefts of motor vehicles rented from international airports and other car rental locations, in the Eastern District of New York and elsewhere, from as early as May 2022 through at least November 2023 (the “Pattern”). Based on the evidence gathered to date, the Pattern consists of the following:

a. Application 1, the identity of which is known to the affiant, is a location-sharing application owned by a United States company (the “Application Company”). Specifically, the Application Company offers both free-access and paid membership to its geolocation platform, accessible through Application 1, through which members can share location information, communicate with each other, send emergency notifications, and monitor vehicle trips and driving speeds, among other functions.

establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

b. Car Rental Agency 1, Car Rental Agency 2, and Car Rental Agency 3, the identities of which are known to the affiant (collectively, the “Car Rental Agencies”) are car rental companies owned by the Car Rental Holding Company, the identity of which is known to the affiant. During the time periods described herein, each of the Car Rental Agencies kept its vehicles that are ready to be rented in a parking lot, unlocked, with each vehicle containing two key fobs connected with a cable wire.

c. ABOUBACAR KABA and/or his co-conspirators enter the parking lot of one of the Car Rental Agencies at an airport or another car rental location in the United States. The airports targeted include John F. Kennedy International Airport in Queens County, New York (“JFK Airport”); Newark Liberty International Airport in Newark, New Jersey (“Newark Airport”); Baltimore/Washington International Thurgood Marshall Airport in Baltimore, Maryland (“BWI Airport”); Ronald Reagan Washington National Airport in Arlington, Virginia; Philadelphia International Airport in Philadelphia, Pennsylvania; Boston-Logan International Airport in Boston, Massachusetts; and Hartsfield-Jackson Atlanta International Airport in Atlanta, Georgia (“Atlanta Airport”). KABA and/or his co-conspirators enter a vehicle parked in said parking lot, and then later exit the vehicle, without ultimately renting the vehicle.

d. Thereafter, a customer legitimately rents the vehicle from one of the Car Rental Agencies and finds a single key fob inside. The renter drives the vehicle out of the lot to another location, often a hotel. The renter parks the vehicle, locks the doors, keeps the single key fob in his or her possession, and leaves the vehicle otherwise unattended. Within the first

twenty-four hours after it was legitimately rented, the vehicle is stolen by KABA and/or his co-conspirators.²

e. The stolen vehicle is then taken by KABA and/or his co-conspirators to another location, often across state lines. For instance, approximately seven vehicles that had been legitimately rented from Car Rental Agencies at airports in the northeastern United States and then stolen from the renters in Pennsylvania, Maryland, and New York were recovered in a garage in the Bronx, New York on or about February 23, 2023.

3. Based on this evidence, my training and experience, and my participation in the investigation, I believe that, when KABA and/or his co-conspirators initially enter a rental vehicle in the parking lot of one of the Car Rental Agencies, they steal one of the two key fobs and place a cell phone inside the rental vehicle. KABA and his co-conspirators then use Application 1 to track the vehicle to another location after its legitimate rental by a customer. KABA and his co-conspirators then steal the vehicle once it is left unattended.

4. Below are descriptions of several instances of the Pattern believed to have been committed by ABOUBACAR KABA and others. Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have set forth only those instances of the Pattern that I believe are necessary to establish probable cause. I have not described each and every instance of the Pattern.

May 2022, Newark Airport: Theft of the Audi Q7

5. Records maintained by the Application Company show that on or about May 18, 2022, an account was created on Application 1 with username “Douk Saga,” email

² As described below, location data obtained during the investigation places KABA at the locations of numerous vehicle thefts following the Pattern.

address douksaga2172@gmail.com,³ and phone number 470-909-0664 (the “douksaga2172 Account”). The Application Company maintains location data for the douksaga2172 Account, which was provided pursuant to a search warrant issued on September 26, 2024, by United States Magistrate Judge Sanket J. Bulsara of the Eastern District of New York.

6. Records maintained by the Application Company further show that on or about May 25, 2022, an account was created on Application 1 with username “T T,” email address 2172ken@yahoo.com, and phone number 678-709-1849. Telephone records show numerous communications between phone numbers 470-909-0664, the telephone number associated with the douksaga2172 Account, and 678-709-1849 in the week leading up to May 26, 2022.

7. On or about May 26, 2022, at approximately 12:45 p.m., video surveillance from the parking lot for Car Rental Agency 3 at Newark Airport in Newark, New Jersey depicts two individuals approaching several parked vehicles. One of these individuals is a tall, skinny, bald black male wearing a face mask, black shirt, ripped blue jeans, and neon yellow sneakers whose physical appearance is consistent with ABOUBACAR KABA. One of the individuals enters an Audi Q7 with license plate number J67PSG (the “Audi Q7”), then exits the vehicle. Both individuals walk away together without renting any vehicles. A still image from video surveillance depicting the two individuals walking away from the Audi Q7 is shown below:

³ The digits in this email address are the same as the street number of KABA’s home address, as listed in law enforcement databases: 2172 Mill Garden Run, Buford, Georgia. Records maintained by the Application Company indicate that another account on Application 1 with username “Alar Kaba” and email address kabaaboubacar2172@gmail.com was created on or about June 18, 2021.



8. A still image depicting the individual believed to be ABOUBACAR KABA inside of Newark Airport on May 26, 2022, is shown below (left), alongside a photograph of ABOUBACAR KABA taken by law enforcement officers on or about December 2, 2022 (right):



9. On or about May 26, 2022, at approximately 2:03 p.m., the Audi Q7 was rented by Renter-1, an individual whose identity is known to your affiant. Renter-1 observed only one key fob to be present inside of the Audi Q7. Thereafter, Renter-1 drove the Audi Q7 to his father-in-law's house in Bloomsbury, New Jersey, parked it outside of the house at

approximately 5:00 p.m., secured the vehicle, kept the one key fob in his possession, and left the Audi Q7 otherwise unattended. At approximately 5:30 p.m., Renter-1's father-in-law arrived at the house and observed the Audi Q7 driving away from the house. Renter-1 reported the theft to law enforcement authorities.

10. On or about May 27, 2022, officers with the New Castle Police Department located the Audi Q7 parked in a residential parking lot in the town of Bear, Delaware.

11. On or about November 21, 2023, a cellular telephone (the "KABA Phone") was seized from ABOUBACAR KABA. The circumstances leading to the seizure of the KABA Phone are described in paragraph 34 below. The KABA Phone was searched pursuant to a search warrant issued on December 28, 2023, by United States Magistrate Judge Lois Bloom of the Eastern District of New York. Analysis of the KABA Phone confirmed KABA's presence at Newark Airport and other locations relevant to the theft of Audi Q7. Specifically, location data shows that on the morning of May 26, 2022, the KABA Phone was located in Bear, Delaware, the location where the Audi Q7 was ultimately recovered; on May 26, 2022, at approximately 12:37 p.m., it was located at Newark Airport; and on May 27, 2022, at approximately 7:26 a.m., it was located in Middletown, Delaware (which is approximately 30 minutes from Bear, Delaware by car).

October 2022, New Haven, Connecticut: Theft of the Toyota 4Runner 756550D

12. On or about October 12, 2022, a Toyota 4Runner with license plate number 756550D (“Toyota 4Runner 756550D”) was rented from Car Rental Agency 2 in New Haven, Connecticut, by Renter-2, an individual whose identity is known to your affiant. Renter-2 drove the Toyota 4Runner 756550D to an address in Milford, Connecticut, parked it at approximately 11:00 a.m., locked the vehicle, kept the only key fob in his possession, and left the Toyota 4Runner 756550D otherwise unattended. Renter-2 left his wallet, containing multiple credit cards, inside of the Toyota 4Runner 756550D.

13. At approximately 2:15 p.m., Witness-1, an individual whose identity is known to your affiant, saw a black male individual with a goatee and black hooded sweatshirt back the Toyota 4Runner 756550D out of its parking spot and drive away. Video surveillance from a nearby camera captured an individual matching the description provided by Witness-1 walking in the vicinity of the Toyota 4Runner 756550D. A still image from this video surveillance, depicting a tall, skinny black male whose physical appearance is consistent with ABOUBACAR KABA, is shown below:



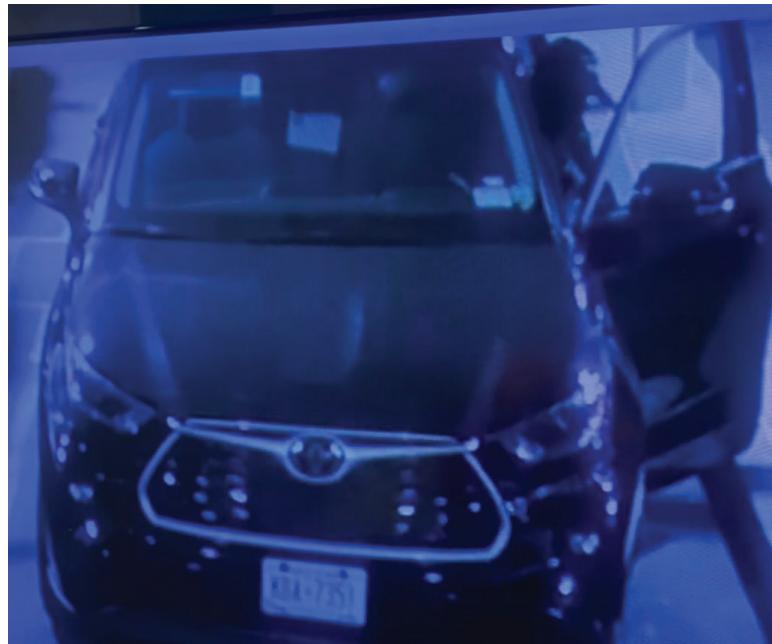
14. At approximately 4:00 p.m., Renter-2 received a notification that his credit card had been used. Renter-2 then returned to the parking lot to find that the Toyota 4Runner 756559D was missing. Renter-2 reported that between approximately 2:15 p.m. and 3:00 p.m., his credit card was used to make purchases at three different retail stores in the “SoNo Mall” located in Norwalk, Connecticut.

15. Location data provided by the Application Company shows that on October 12, 2022, between approximately 2:49 a.m. and approximately 12:38 p.m., the douksaga2172 Account travelled from the vicinity of Newark, New Jersey, into Connecticut, and towards Milford, Connecticut. Between approximately 2:38 p.m. and 3:01 p.m., the user of the douksaga2172 Account travelled from an area northwest of Bridgeport, Connecticut, into Norwalk, Connecticut. At approximately 2:57 p.m., the user of the douksaga2172 Account was located in the vicinity of the SoNo Mall. Location data on the KABA Phone shows that on October 12, 2022, at approximately 3:42 p.m., the KABA Phone was also located in the vicinity of the SoNo Mall.

December 2022, JFK Airport: Theft of the Toyota Highlander KBA7351

16. On or about December 10, 2022, video surveillance from the Car Rental Agency 2 parking lot at JFK Airport depicts a tall, skinny black male individual wearing a dark-colored baseball cap, whose physical appearance is consistent with ABOUBACAR KABA, sit in the driver’s seat of a parked Toyota Highlander with license plate number KBA7351 (“Toyota Highlander KBA7351”). KABA then exits the vehicle, closes the door, and points what appears to be a cellular telephone at the vehicle in a manner consistent with taking a photograph or video. KABA then walks away without renting the Toyota Highlander

KBA7351. A still image from the video surveillance depicting KABA exiting the Toyota Highlander KBA7351 is shown below:



17. That same day, video surveillance from the Car Rental Agency 1 office at JFK Airport depicts the same individual whose physical appearance is consistent with KABA sit in a chair in the office and appear to talk on a cellular telephone for several minutes. A still image from the video surveillance depicting the individual is shown below:



18. Location data provided by the Application Company shows that on December 10, 2022, at approximately 10:09 p.m., the user of the douksaga2172 Account was located at the Car Rental Agency 1 office at JFK Airport.

19. On December 12, 2022 at approximately 11:21 a.m., the Toyota Highlander KBA7351 was rented by Renter-3, an individual whose identity is known to your affiant.⁴ Renter-3 observed only one key fob to be present inside of said vehicle. Renter-3 drove the Toyota Highlander KBA7351 to Hotel Nyack at 400 High Avenue, Nyack, New York, parked it in the hotel parking lot at approximately 3:00 p.m., locked the doors, kept the one key fob in his possession, and left the Toyota Highlander KBA7351 otherwise unattended. The following morning, Renter-3 returned to the hotel parking lot to find that the Toyota Highlander KBA7351 was missing, and later reported the theft to law enforcement authorities.

20. On or about December 16, 2022, law enforcement authorities located the Toyota Highlander KBA7351 at a parking lot in the Bronx, New York.

December 2022, JFK Airport: Recovery of the Samsung Phone

21. On or about December 19, 2022, an employee of Car Rental Agency 2 at JFK Airport whose identity is known to your affiant observed an individual entering and exiting one black Toyota Tundra rental car with Maryland license plate # 6FE0418 (“Toyota Tundra 6FE0418”) in the parking lot of Car Rental Agency 2 and appearing to take pictures of the Toyota Tundra 6FE0418 with a cellular telephone. The employee contacted the PANYNJ PD, who relayed this information to your affiant. I responded to the Car Rental Agency 2 parking

⁴ A police report generated by the Orangetown Police Department indicates that Renter-3 stated that he rented the Toyota Highlander KBA7351 when he arrived at LaGuardia Airport in Queens, New York. However, records maintained by the Car Rental Holding Company indicate that the Toyota Highlander KBA7351 was in fact rented from JFK Airport.

lot at JFK Airport and observed the Toyota Tundra 6FE0418 to be unoccupied. During a consensual search of the Toyota Tundra 6FE0418, I observed one black Samsung cellular telephone (the “Samsung Phone”), inside of a closed binder in the glove compartment of said vehicle.

22. The Car Rental Holding Company has no records of any personal property being left behind in the Toyota Tundra 6FE0418 by the last customer to rent said vehicle prior to the discovery of the Samsung Phone. The Car Rental Holding Company has no records of any person requesting the return of the Samsung Phone. Similarly, I am unaware of any contacts to the PANYNJ PD or to any other law enforcement agency seeking the return of the Samsung Phone.

23. Pursuant to a search warrant issued on November 30, 2023, by United States Magistrate Judge Cheryl L. Pollak of the Eastern District of New York, the Samsung Phone was searched, and law enforcement discovered that the Samsung Phone was used to access an Application 1 account associated with email address wamba2172@gmail.com (the “wamba2172 Account”). Records maintained by the Application Company show that the first name provided by the user of the wamba2172 Account is “T1,” the last name provided is “T1,” and the wamba2172 Account was created on or about October 14, 2022. Based on this evidence, my training and experience, and my participation in the investigation, I believe that the Samsung Phone was placed into the Toyota Tundra 6FE0418 in the Car Rental Agency 2 parking lot at JFK Airport to be used as a tracking device to enable an individual or individuals to locate and steal the vehicle as part of the Pattern.

January-February 2023: Theft of Seven Rental Vehicles and Recovery in the Bronx

24. Between approximately January 27, 2023 and February 13, 2023, at least seven additional vehicles that had been rented from the Car Rental Agencies at airports in the northeast United States were stolen from the renters following the Pattern described above. The vehicles included one Volkswagen Atlas, one Dodge Challenger, two Toyota Highlanders, one Audi Q7, one BMW X5, and one Toyota Tacoma. The thefts from the renters occurred in Pennsylvania, Maryland, and New York.

25. Location data maintained by the Application Company shows that on January 27, 2023, the user of the douksaga2172 Account travelled from Atlanta, Georgia, to New York, New York. Between January 27, 2023, and February 17, 2023, the user of the douksaga2172 Account made several trips from locations at which Car Rental Agency 1 vehicles were stolen to the vicinity of a parking garage at 675 Morris Avenue, Bronx, New York.

26. For instance, on or about February 3, 2023, a Toyota Highlander with license plate number 5115784 (“Toyota Highlander 5115784”) was rented at the BWI Airport from Car Rental Agency 2 by Renter-4, an individual whose identity is known to your affiant. Renter-4 parked the Toyota Highlander 5115784 at a hotel located at 720 Blair Mill Road, Horsham, Pennsylvania. On the night of February 3-4, 2023, Renter-4 awoke and looked out the window of his hotel room to see the lights flash on the Toyota Highlander 5115784, and a black male individual wearing a puffy coat enter the vehicle and drive away.

27. Location data maintained by the Application Company shows that on February 4, 2023, at approximately 2:47 a.m., the user of the douksaga2172 Account was located in the vicinity of 720 Blair Mill Road, Horsham, Pennsylvania. On February 4, 2023, the user of the douksaga2172 Account then travelled from Horsham, Pennsylvania, to the vicinity of 675

Morris Avenue, Bronx, New York, where it arrived at approximately 9:45 p.m. License plate readers captured the Toyota Highlander 5115784 at the same approximate locations and times as the douksaga2172 account: entering Brooklyn, New York, via the Verrazano Bridge at approximately 4:09 a.m. on February 4th; thereafter, travelling over the Manhattan Bridge and the Holland Tunnel; and, at approximately 9:30 p.m. on February 4th, crossing the George Washington Bridge towards the Bronx.

28. Besides this trip, location data maintained by the Application Company also shows that the user of the douksaga2172 Account travelled to the vicinity of 675 Morris Avenue, Bronx, New York, on at least February 5, 2023, February 8, 2023, February 10, 2023, February 13, 2023, and February 14, 2023.

29. Location data from the KABA Phone indicates that the user was also located in the vicinity of 675 Morris Avenue, Bronx, New York, on or about February 8, 2023 at approximately 12:28 a.m. Records maintained by the parking garage at 675 Morris Avenue indicate that the Toyota Highlander 5115784 was checked into the garage on or about February 9, 2023 at approximately 6:57 a.m.

30. Video surveillance cameras at 675 Morris Avenue depict the arrival of several stolen vehicles. On or about February 14, 2023, video surveillance depicts a separate Toyota Highlander, which was stolen from a renter in Clifton Park, New York, arriving at 675 Morris Avenue. The Toyota Highlander stops at a point where the camera's view of the driver's seat is obscured by a wall, and shortly thereafter one tall, skinny, bald black male whose physical appearance is consistent with ABOUBACAR KABA walks into frame from the direction of the driver's seat. A still image from the video surveillance depicting the male is below:



31. On or about February 23, 2023, members of the New York City Police Department responded to a report of a stolen vehicle at the parking garage at 675 Morris Avenue, Bronx, New York. The officers checked law enforcement databases to determine if any other vehicles present at 675 Morris Avenue were stolen, and they found that the Toyota Highlander 5115784 and the six other stolen vehicles described above were all present at 675 Morris Avenue.

November 2023, Atlanta Airport: Theft of Jeep Gladiator SMP7348

32. On November 16, 2023, at approximately 8:01 a.m., a Jeep Gladiator with license plate number SMP7348 (“Jeep Gladiator SMP7348”) was rented from Car Rental Agency 1 at Atlanta Airport in Atlanta, Georgia, by Renter-5, an individual whose identity is known to your affiant. Renter-5 drove the Jeep Gladiator SMP7348 to a Dunkin Donuts at 925 Virginia Avenue, Hapeville, Georgia, parked it in the parking lot at approximately 5:00 p.m.,

kept the key fob in his possession, and entered the Dunkin Donuts. When Renter-5 exited the Dunkin Donuts, Renter-5 found that the Jeep Gladiator SMP7348 was missing, and later reported the apparent theft to law enforcement authorities.

33. During their investigation, law enforcement observed video surveillance depicting the theft of the Jeep Gladiator SMP7348. Video surveillance depicts a tall, skinny black male holding a cellular telephone approach the Jeep Gladiator SMP7348, use a key fob to unlock the Jeep Gladiator SMP7348, enter the driver's seat, and drive away. Surveillance cameras depict the Jeep Gladiator SMP7348 travelling to an apartment complex at 1000 Barone Avenue, Atlanta, Georgia. Surveillance cameras further depict one Kia Sorento with Georgia license plate number CWY2960 (the "Kia Sorento") in the vicinity of Virginia Avenue around the time of the theft of the Jeep Gladiator SMP7348, and in the vicinity of 1000 Barone Avenue around the time that the Jeep Gladiator SMP7348 arrived there.

34. On November 21, 2023, law enforcement officers observed the Kia Sorento travelling on North Central Avenue, Atlanta, Georgia, and conducted a traffic stop. Law enforcement officers observed Co-Conspirator 1, an individual whose identity is known to your affiant, in the driver's seat, and a male later identified as ABOUBACAR KABA seated in the rear. A law enforcement officer spoke to Co-Conspirator-1 and showed him the video surveillance depicting the theft of the Jeep Gladiator SMP7348, and Co-Conspirator-1 identified the tall, skinny black male depicted therein as ABOUBACAR KABA. KABA was placed under arrest. During a search incident to his arrest, the KABA Phone and another cell phone were recovered from KABA.

WHEREFORE, your deponent respectfully requests that the defendant ABOUBACAR KABA, be dealt with according to law.

/s/ Stephen Intrabartola

STEPHEN INTRABARTOLA
Special Agent, Federal Bureau of Investigation

Sworn to before me this
25 day of February, 2025

Lara K. Eshkenazi
THE HONORABLE LARA K. ESHKENAZI
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK